

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

Master File No. 1:00-1898
MDL 1358 (SAS)
M21-88
ECF Case

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This document relates to the following case:

City of New York v. Amerada Hess Corp., et al.
Case No. 04 Civ. 3417

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**DECLARATION OF LESLEY E. WILLIAMS IN SUPPORT OF PLAINTIFF
CITY OF NEW YORK'S REPLY MEMORANDUM IN SUPPORT OF ITS
MOTION *IN LIMINE* NO. 1 TO EXCLUDE EVIDENCE OR ARGUMENT THAT
FEDERAL OR NEW YORK LAW EVER REQUIRED MTBE IN GASOLINE
DELIVERED TO OR SOLD IN THE RGA**

Lesley E. Williams, an attorney licensed to practice in the State of New York and in the United States District Court for the Southern District of New York, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of Sher Leff LLP, counsel for Plaintiff the City of New York ("the City") in the above-captioned matter. I submit this Declaration in support of Plaintiff City of New York's Reply Memorandum in Support of Its Motion *in Limine* No. 1 to Exclude Evidence or Argument That Federal or New York Law Ever Required MTBE in Gasoline Delivered to or Sold in the RGA (the "Reply"). This declaration authenticates the exhibits attached hereto and relied on in the City's Reply. In accordance with the Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around June 2, 2009.
2. Attached as Exhibit 1 is a true and correct copy of excerpts from the Deposition of

Eugene Renna (“Renna Deposition”), April 23, 2008, at 156:3-157:18, 142:3-144:25;

3. Attached as Exhibit 2 is a true and correct copy of Oxygenated/Reformulated Gasoline Management Review, Renna Deposition Ex. 22 (Bates No. MDL1358hM-0167458-66).

4. Attached as Exhibit 3 is a true and correct copy of a letter from M. Lyons, Archer Daniels Midland, to T. Martenak, Mobil (including attachments), dated December 28, 1994, Renna Deposition Exhibit 18 (Bates No. MDL 1358hM-0166523-5).

On this 2nd day of June 2009, I hereby declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: San Francisco, California
June 2, 2009

/s/ LESLEY E. WILLIAMS
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